

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 01-455-A
)	
ZACARIAS MOUSSAOUI)	

GOVERNMENT'S MOTION FOR ADDITIONAL TIME
TO RESPOND TO DEFENDANT'S MOTION AND COURT ORDER

The United States respectfully requests an additional four days – until April 14, 2003 – to respond to the defendant's motion entitled "REDACTION TO COVER UP THEIR LIES – Motion to know how the United Satan is lying to murder me by 'legal' means and to get access to unclassified transcript and motion that expose Ashcroft 20th lies and his latest new theory of the 5th plane to White House" (docket number 821, filed April 3, 2003) and the Court's Order of April 4, 2003.

Defendant's motion was filed on April 3, 2003. Local Rule 12(a) provides that a "response to any motion shall be filed within eleven (11) days after the filing of [a] motion or such other time as may be fixed by the Court." Because there is no trial date currently set in this case and substantial parts of this case are stayed pending appeal, there is no reason to deprive the Government of the eleven days to respond.

In addition, the Government's reply brief in the pending Fourth Circuit appeal is now due on April 8, 2003. An extension of time to reply to defendant's motion (docket number 821) and

the Court's Order would allow the Government welcome additional time to respond.

Respectfully submitted,

Paul J. McNulty
United States Attorney

By: /s/
Robert A. Spencer
Kenneth M. Karas
David J. Novak
Assistant United States Attorneys

Certificate of Service

I certify that on the 8th day of April 2003, a copy of the foregoing pleading was provided to the defendant via delivery to the U.S. Marshals Service and to the counsel listed below:

Edward B. MacMahon, Jr., Esquire
107 East Washington Street
P.O. Box 903
Middleburg, Virginia 20118
(540) 687-3902
fax: (540) 687-6366

Frank W. Dunham, Jr., Esquire
Public Defender's Office
Eastern District of Virginia
1650 King Street
Alexandria, Virginia 22314
(703) 600-0808
Fax: (703) 600-0880

Alan H. Yamamoto, Esquire
108 N. Alfred Street
Alexandria, Virginia 22314
(703) 684-4700
fax: (703) 684-9700

/s/
Robert A. Spencer
Assistant United States Attorney